

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

PRESTON WOOD & ASSOCIATES, LLC, §
Plaintiff, §

VS. §

CIVIL ACTION NO. 4:16-cv-01427

RZ ENTERPRISES USA, INC. D/B/A §
OPPIDAN HOMES, OPPIDAN HOMES §
VII LTD., CAMERON ARCHITECTS, INC. §
and UL, INC. D/B/A URBAN LIVING, §
Defendants. §
§

DEFENDANTS' MOTION IN LIMINE

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Defendants, who file this Motion in Limine, to prohibit the introduction of evidence as described below.

This Motion is being presented before the commencement of voir dire of the jury panel. Movant requests that counsel for Plaintiffs, and all of Plaintiffs' witnesses, be instructed by Court order to refrain from making any mention, directly or indirectly, to urge, testify, or otherwise attempt to introduce the following types of evidence in voir dire examination, opening

statements, presentation of evidence, arguments before the Court, final argument or any other time.

Movant would show the Motion should be granted because the types of evidence listed are irrelevant to the issues involved, or are otherwise not admissible because the possible probative value of the evidentiary materials listed in this Motion is far outweighed by its prejudicial effect.

The following matters should be prohibited and would not be admissible for any purpose in this cause:

1. Settlement negotiations.

_____GRANTED _____DENIED _____AGREED

2. Other lawsuits between the parties.

_____GRANTED _____DENIED _____AGREED

3. Other alleged infringement of PWA's works that are not at issue in this lawsuit.

_____GRANTED _____DENIED _____AGREED

4. The assets or wealth of any defendant.

_____GRANTED _____DENIED _____AGREED

Reference to other lawsuits which may have been filed in regard to other matters not involved in this litigation.

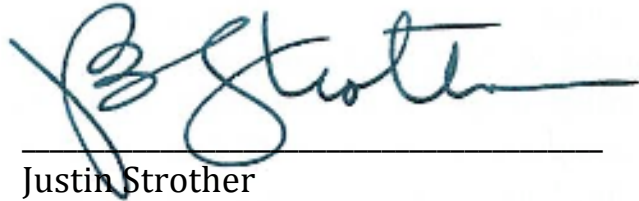
- a. Reference to other lawsuits which may have been filed against any of the Defendants involved in this litigation.
- b. Reference to settlement of other lawsuits which may have been filed against any of the Defendants involved in this litigation.
- c. Reference to any judgments or verdicts in other lawsuits which may have been filed against any of the Defendants involved in this litigation.
- d. Reference to any discovery disputes, such as the filing of any motion for protective order or the failure or refusal by this party to disclose or produce, any document or tangible thing in answer or response to a request for discovery, the filing of a motion to compel, the occurrence of any discovery disputes, and any rulings on such motions, responses, or disputes.

III.
PRAYER

WHEREFORE, PREMISES CONSIDERED, the Defendants ask the Court to grant their Motion in Limine and to grant Defendants any and all relief to which they are justly entitled.

Respectfully submitted,

STROTHER LAW FIRM

A handwritten signature in blue ink, appearing to read 'J Strother', is written over a horizontal line.

Justin Strother
State Bar No.: 24008100
Southern District Bar No. 27331
3000 Wesleyan Blvd., Suite 348
Houston, Texas 77027
713.545.4937
jstrother@strotherlawfirm.com

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on this 16th of July, 2018, a true and correct copy of the foregoing has been forwarded to all counsel of record via courier service or via electronic service through the court clerk.

A handwritten signature in blue ink, appearing to read 'J Strother', is written over a horizontal line.
Justin Strother